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OFFICE OF  
ENVIRONMENTAL CLEANUP

May 15, 2014

Mr. Kevin L. Rochlin  
Remedial Project Manager  
U.S. Environmental Protection Agency  
Region 10  
1200 Sixth Avenue, ECL-111  
Seattle, WA 98101

**RE: Monthly Report: No. 215, April 2014**  
**Operable Unit No. 02- Asarco Tacoma Smelter Site**

Dear Mr. Rochlin:

Point Ruston is submitting this monthly report per the requirements of paragraph 48 of the Consent Decree for the above referenced site. The report is organized to follow item (a) through (g) of this paragraph.

In order to more efficiently produce this information we have included all of the related data in digital format on the attached disk.

If you have any questions, please call me at (253) 752-2185, extension 236.

Sincerely,

Loren Cohen  
Manager of Legal Affairs

Attachment (2 copies)

cc: Peter Striplin - Washington Department of Ecology  
Evan Griffiths - CH2MHill (2 copies)  
Mike Oelrich - Hydrometrics, Inc.

USEPA SF



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**A. *Actions taken to achieve compliance with the Consent Decree during the previous month.***

1. Point Ruston personnel and its contractors continued to implement various components of Remedial Action over the month of April. Work continued on many various RA tasks, including work associated with the following projects:
  - Phase 1 CMP – O&M
  - Waterwalk CMP – O&M
  - Temporary Cap & Storm Water Management Plan – O&M
  - Sequence of Development Plan & Occupancy Plan – Implementing standards of site occupancy
  - Occupancy Air Monitoring Plan – Daily air monitoring and reporting
  - Long Term OMMP – O&M
  - Metro Parks Peninsula Park CMP – O&M
  - Phase 2 CMP – On-going construction
  - Building 2B – On-going construction

A letter requesting Certification of Completion for Phase 1 was submitted to the EPA on April 3, 2014.

2. Point Ruston continued to conduct on-site and off-site Air Monitoring per the approved air monitoring plan under the CH&SP.
3. Point Ruston continued to conduct weekly inspections and routine maintenance on the TIC and site-wide storm water conveyance system.
4. Point Ruston continued to perform all site maintenance and monitoring, including all requirements under the Site Wide Construction Health and Safety Plan as well as implementation of the OCF OMMP plan. This included collection, sampling and contracting for the hauling of the leachate. O&M also included maintaining clean work areas and roads, fencing and CRZ connections between the site area and phases. O&M inspection reports, conducted weekly, and the associated data is included in the site-inspection reports (See Attached).
5. Point Ruston conducted training activities for site visitors and workers, including the following:
  - Site Safety Orientations (Clean Zone) were held for:
    - i. One hundred nineteen (119) personnel of various companies
  - HAZWOPER Basic training was verified or completed by personnel of the following companies:
    - i. One (1) Point Ruston employee
    - ii. One (1) Labor Works employee
    - iii. One (1) City of Tacoma employee

- iv. One (1) GeoResources employee
- v. Four (4) Serpanok Construction employees
- vi. One (1) A.A.R. Testing Lab. employee
- HAZWOPER annual retraining was verified or completed by personnel of the following companies:
  - i. One (1) Labor Ready employee
  - ii. One (1) ESM employee
  - iii. One (1) Drain-Pro Employee
  - iv. One (1) City of Tacoma employee
  - v. One (1) Azure-Green employee
  - vi. One (1) Point Ruston employee
  - vii. One (1) Labor Ready employee
- Site Specific Safety Training (Exclusion Zone) was held for personnel of the following companies:
  - i. Four (4) Point Ruston employees
  - ii. Three (3) Labor Ready employees
  - iii. One (1) City of Tacoma employee
  - iv. Five (5) Serpanok Construction employees
  - v. Two (2) GeoResources employees
  - vi. One (1) Hydrometrics employee
  - vii. One (1) Azure-Green employee
  - viii. One (1) A.A.R. Testing Lab. employee
- Other relevant monitoring or training was verified or completed by personnel of the following companies:
  - i. Five (5) Serpanok employees (Medical Surveillance)
  - ii. One (1) Evergreen Excavation employee (Medical Surveillance)
  - iii. Four (4) Point Ruston employees
  - iv. Three (3) DM Kelly employees
  - v. One (1) City of Tacoma employee

***B. Summary of sampling, tests and all other data received or generated by Point Ruston in the previous month.***

1. Storm water outfall sampling, data and related activities include the following:

Section 2.3 of the Final Statement of Work (SOW) for Remedial Design and Remedial Action – Exhibit F to the Second Amendment requires Point Ruston to continue outfall monitoring. Outfalls will be monitored to determine if the monthly average surface water outfall concentrations for arsenic, copper and zinc exceed 0.5 ppm at the North and South site outfalls until they are abandoned. The South outfall was abandoned on February 15<sup>th</sup>, 2013.

Weekly composite samples will be collected at each outfall during the construction season. During the winter season, outfall samples will be collected every other month. Asarco began the following schedule in May of 2003, which Point Ruston will continue to implement: weekly composite samples will be collected from April-October, and in December and February.

In addition to the North Outfall, Point Ruston monitors an existing upland station southwest of the Grand Avenue & Ruston Way roundabout. This monitoring station is designated OSW2. Samples were collected by Point Ruston from the outfall locations on April 7<sup>th</sup>, 14<sup>th</sup>, 21<sup>st</sup> 28<sup>th</sup> and May 5<sup>th</sup>. Results from samples collected are attached. There were no exceedances.

2. OCF leachate sampling, data, disposal and related activities include the following:

Point Ruston collects OCF leachate in a 5,000-gallon polyethylene tank for offsite shipment and disposal. The OCF OMMP requires inspections to correspond with monthly, quarterly, or semi-annual reporting intervals as specified by the Response Action Plan. However, Point Ruston inspects LCRS and LDCRS volumes daily. LCRS volumes currently average approximately 80 gallons per day. Leachate disposal was not required in April.

3. Air Monitoring, sampling, data and related activities include the following:

Point Ruston performs perimeter (off-site) air monitoring for arsenic and lead analysis at two locations: NW corner of OCF and south ridge of OCF (vault #1). Point Ruston also performs occupancy (on-site) air monitoring for arsenic and lead analysis at three additional locations: Lot 4B (nursery), Lot 8 (Phase 2) and Lot 14. On March 21, 2014 Point Ruston moved the air monitor from Lot 14 to Lot 9 in anticipation of T.I.C. removal and excavation activity on lots 9 and 11 as per Phase 2, Sequence A in the Construction Management Plan. Results for samples collected March 31<sup>st</sup> through April 27<sup>th</sup> are attached. There were no exceedances.

Point Ruston performs monitoring for total suspended particulates (TSP) with a 24-hour daily average trigger level of 81  $\mu\text{g}/\text{m}^3$ . A long-term dust monitoring network consisting of three (3) real-time dust monitors was installed on March 15, 2013. Currently the TSP e-sampling stations are installed in the following locations: Lot 1A, Lot 12 and Lot 2A (roof). The TSP monitors transmit 5-minute average TSP readings to a host computer that logs and calculates the data into 60-minute averages. If 60-minute averages exceed the trigger level the host computer will generate an email and/or text notification to designated personnel who will investigate and take appropriate action. Air monitoring details, including corrective actions, are found in Appendix A of the Development and Occupancy Plan. TSP data is evaluated and

recorded daily. Charts showing the average daily TSP and weather data are attached. There were no trigger exceedances in April.

NOTE: The TSP at Lot 12 was removed from service on March 6<sup>th</sup> after unsuccessful troubleshooting efforts regarding data or communication issues. The sampler was returned to the manufacturer for repairs and maintenance. The sampler was returned to service on April 1<sup>st</sup> after repairs were completed. However, it remains off-line for real-time data. Data will be collected manually on a daily basis until the radio communications are restored.

Point Ruston performs personal air monitoring in accordance with WAC 296-848-20060(1) & WAC 296-155-17609(1) (a) to determine if the airborne concentrations of arsenic and lead exceed the PEL. Personal air monitoring was performed on April 1<sup>st</sup> during Phase 2 – Lot 9 & 18 T.I.C. removal activities. Activities included: cutting, dragging and stacking sections of T.I.C. liner materials. Personal air monitoring was also performed on April 30<sup>th</sup> during Phase 2 – Lot 11 excavation activities. Activities included: digging and loading with an excavator; hauling and dumping with a haul truck; re-loading with an excavator; hauling (to Lot #10C) and dumping with a highway dump truck; spreading and grading with an excavator, bulldozer and roller; and grade checking the excavation area. Exposure Evaluation reports and results for samples collected are attached. There were no exceedances.

4. Methane gas monitoring sampling, data and related activities include the following:

Point Ruston performs subsurface methane gas monitoring pursuant to the EPA approved "Building 2B Sampling & Analysis Plan – Subsurface Gas Monitoring Activities" plan. In 2009 a passive gas extraction system was installed in conjunction with the 2B-West building foundation. Four (4) vent pipes were roughed-in through the floor slab. Sampling at these locations has been ongoing, pursuant to ASTM E2600. The Gas Monitoring Data Log and field worksheet for the month of April are attached. No methane has been detected to date. Methane monitoring of the passive extraction system will be discontinued indefinitely.

5. Point Ruston performs miscellaneous on-site soil sampling related to its various ongoing RA work and development. Analysis results are attached.

- Confirmation sampling was conducted on April 7<sup>th</sup> from temporary clean gravel cap material that came into contact with water spilled during storm water management activities.
- Confirmation sampling was conducted on April 8<sup>th</sup> from haul roads adjacent to Phase 2 exclusion zone activities

- Confirmation sampling was conducted on March 13<sup>th</sup> from the Main Street haul road at the location where waste soils were loaded into highway dump trucks for transport to Lot #10C.
- Final cap sampling was conducted on April 22<sup>nd</sup> from imported crushed gravel for use as a base for asphalt surfaces on Phase 1 – Lot 2.

**C. *Work Plans and other deliverables completed and submitted during the previous month.***

**1. Plans and Documents included the following:**

**Certification of Completion for Phase 1**

On April 3, 2014, Hydrometrics, on behalf of Point Ruston, submitted a letter requesting issuance of EPA Certification of Completion for the Phase I projects, pursuant to the SOW and Paragraph T (amending paragraph 65), of the Second Amended Consent Decree.

**Sediment Capping RA**

Point Ruston and DNR continue to pursue the Consent Decree with the EPA.

**Phase 2 CMP**

The installation of site controls (storm water, dust, and air monitoring) started at the end of January, 2014, in preparation for Phase 2 construction activities. Phase 2 construction commenced with removal of the Temporary Cap within the Building 1A footprint on February 3, 2014 and within the Building 9 and 11 footprint on March 31, 2014. Work continues on excavation of Building 9 and 11 and construction of the Building 1A foundation.

**Billboard Signs Along Ruston Way**

Point Ruston requested EPA approval on April 11, 2014 for the installation of two additional billboards along Ruston Way. Work was conducted to install the signs and reattach the temporary cap to the billboard post with HDPE liner boots during the week of April 21, 2014.

**2. Remedial Action included the following tasks:**

**OCF RA construction activities:**

Maintained leachate collection system; inspected storm drain system, vaults and cover; maintained the temporary storage area related to site-wide grading and Temporary Cap construction.

**Phase 1 CMP RA construction activities:**

All RA activities are complete, and O&M of the RA components is on-going. Vertical construction of the condominium component of Phase 1 is on-going.

**Building 2B RA construction activities:**

During the month of April, preparations were made to complete the AC cap in the alley between Building 2A and 2B and by the end of April the AC cap in this area was complete. In addition, the PCC cap was constructed at the entrances to the Building 2B East condominiums.

**Waterwalk CMP RA construction activities:**

O&M activities have been ongoing, and Point Ruston has implemented final punch work associated with City of Tacoma requirements for the Waterwalk.

**Temporary Impervious Cap and Construction Storm Water Management Plan RA construction activities:**

The TIC has been completed and O&M of the TIC is on-going.

**Peninsula Park CMP RA construction activities:**

All RA activities are complete, and O&M of the RA components is on-going.

➤ **Site-wide remediation/redevelopment activities:**

- Continued surface water controls
- Construction continues on the Phase 2 CMP under the approved Phase 2 CMP
- Maintained onsite haul roads and stockpiles
- Maintained erosion and surface water controls; Inspected and repaired silt fence and exclusion zone fencing.
- Continued site-wide dust monitoring and control through site and access road watering, as needed.
- Maintained air-monitoring program per CH&SP requirements
- Continued to maintain Ruston Way Construction Health and Safety protocols, including air monitoring, dust suppression, buffer zone maintenance, fencing and signage.

**D.     *Actions scheduled for the next six weeks.***

1. Continue to work with DNR and EPA to ensure finalization of the Consent Decree between the agencies is accomplished in accordance with the terms of the Point Ruston/DNR settlement agreement.
2. Point Ruston to maintain the Ruston Way Health and Safety protocols, including applying tackifier to all buffer areas with exposed soils and continuing to monitor for dust.

3. Point Ruston to continue implementation of the Waterwalk occupancy controls as well as any required O&M.
4. Point Ruston to continue implementation of the Phase 1 (Copperline Apartments) occupancy controls as well as any required O&M.
5. Point Ruston to continue implementation of the Peninsula Park occupancy controls as well as any required O&M.
6. Construction of Building 2B is ongoing. Continue to implement and maintain site controls during RA work.
7. Vertical construction of the 2B condominium is ongoing.
8. Construction of Phase 2 is ongoing. Continue to implement and maintain site controls during RA work.
9. Continue to work through final close-out issues under the Peninsula Park CMP project.
10. Continue the O&M and inspections associated with the TIC and site-wide storm water facilities.
11. Continue CH&SP air monitoring during RA activities.
12. Work with EPA to resolve any issues with regard to the installed Biobarrier at existing landscaping.
13. Continue to work on necessary items to close the purchase and sale of the Waterwalk property, per the terms of the agreement with the City of Tacoma.
14. Continue with construction of the Phase 2 CMP and Building 2B.

The following Remedial Action tasks are planned to continue:

**Monitoring:**

- a. Outfall sampling (weekly composite samples) during scheduled months
- b. Air monitoring per the Air Monitoring Plan

**OCF OMMP activities:**

- a. Continue collection of leachate for offsite disposal
- b. Continue monitoring of leachate volumes

**Stack Hill activities:**

- a. Erosion controls and site maintenance; and maintain roads and landscaping.
- b. Continue sales & marketing efforts from sales office

**Site-wide construction activities:**

- a. Maintain roads and stockpiles onsite
- b. Maintain erosion controls
- c. Maintain erosion control BMPs and CH&SP standards

**Phase 1 CMP**

- a. Continue to implement all necessary O&M of the approved Phase 1 area.

**Waterwalk CMP**

- a. Maintain erosion control BMPs and CH&SP standards as well as conduct all necessary O&M inspections and maintenance.
- b. Monitor the children's playground



**Peninsula Park CMP**

- a. Maintain erosion control BMPs and CH&SP standards as well as conduct all necessary O&M inspections and maintenance.

**Temporary Impervious Cap and Construction Stormwater Management Plan**

- a. Continue to monitor the TIC and conduct all necessary O&M inspections and maintenance.

**Phase 2 CMP**

- a. Maintain site controls and continue excavation of Building 9 and 11.
- b. Continue placement of materials in the Cooling Pond.

**E. *Percentage completion, unresolved delays encountered or anticipated that may affect schedule, and efforts to mitigate delays.***

- Completion of EPA negotiations on RA schedule modifications and associated matters related to the Consent Decree.
- The City of Ruston's interpretation of CERCLA Section 121 interferes in Point Ruston's implementation of vital aspects of the on-site remedial action and redevelopment of the former ASARCO smelter site.

**F. *Modifications to work plans or schedules proposed to or approved by EPA.***

1. The Second Amendment to the Consent Decree was finalized and the sale of the property to Point Ruston LLC completed on October 31, 2006.
2. Point Ruston and EPA agreed to begin final negotiations of a Consent Decree amendment to include updates to the SOW Schedule. Discussions are on-going. Point Ruston has entered into tolling agreements with the Department of Justice in order to facilitate negotiations over this extension and other related aspects of the Consent Decree.

**G. *Activities undertaken to support Community Relations Plan during the previous month and planned for the next four weeks.***

1. Point Ruston continues to work in conjunction with staff from the Town of Ruston and City of Tacoma regarding development plans which incorporate remediation components for the site, including operation, maintenance, and monitoring issues at the site.